

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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PR Docket No. 92-235

In the Matter of:

Replacement of Part 90 by Part 88 to
Revise the Private Land Mobile Radio
Services and Modify the Policies
Governing Them

To: The Commission

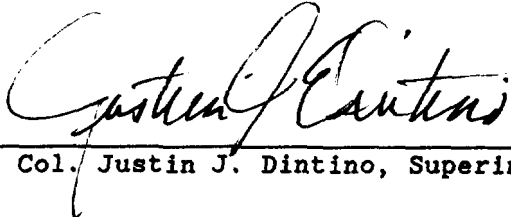
COMMENTS OF THE NEW JERSEY STATE POLICE

The New Jersey Division of State Police ("NJSP") hereby submits the following comments in response to the Commission's Notice of Proposed Rule Making in the above-captioned proceeding.

Respectfully submitted,

New Jersey Division of State Police
Box 7068
West Trenton, NJ 08628

By:


Col. Justin J. Dintino, Superintendent

July 27, 1993

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STATEMENT OF INTEREST

The NJSP is involved in the allocation of Police and Local Government frequencies below 512 MHz through participation as a local frequency advisor for the Associated Public Safety Communications Officers, Inc. (APCO). In this capacity, the NJSP is uniquely able to comment on the congestion of radio channels in a multi-metropolitan area. While many comments indicate that their area is severely congested, New Jersey presents a situation that is unparalleled in the country. Situated between the Cities of Philadelphia and New York, New Jersey is impacted by an overlap of two major cities. This overlap does not provide a low density buffer as found between other metropolitan areas. The comments offered include observations from this prospective and may differ from areas not experiencing the severe problems that are daily concerns in New Jersey.

COMMENTS

NJSP supports the goal of the Commission's Notice of Proposed Rule Making ("Notice") to renovate the Public Land Mobile Radio ("PLMR") bands below 512 MHz. We specifically support the comments of APCO in all but two important areas. For the sake of brevity, these reply comments will address the exceptions taken with the APCO comments, but do not detract from our overall support for areas not specifically addressed.

REFARMING 421 - 512 MHz. BAND

The NJSP believes that the plan offered by APCO to allot the new channels in 450 - 460 Public Safety band to be flawed. APCO proposes that the low power restrictions continue in this band and that existing operations be given primary status. APCO argues that these low power 12.5 KHz offset channels perform critical public safety functions. This is true of some of the operations currently licensed as offset channels. However, many of these channels are used for non-critical applications. Operations which monitor water levels and control lawn sprinklers are examples of many telemetry type of operations in New Jersey. The use of these offset channel for continuous transmit of satellite receiver and transmitter control links, for the purpose of replacing telephone lines, are also uses for these offset channels in New Jersey. Giving these type of operations primary status would deprive this spectrum starved area of frequencies which could be used for regular and necessary two way communications. Also, the licensing of the existing offset channels was limited to "MOBILE", even if the operation was for a fixed operation. As such, records do not exist as to the actual placement of the stations by specific coordinates. Without coordinates of operation, frequency coordination to a primary operation would be difficult, if not impossible.

The NJSP suggests that a plan for refarming of the 450 -460 MHz

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3. Create a high power land mobile two-way allotment. These channels would be governed by the coverage, antenna height and power restrictions as proposed for the 460 - 470 band. Operations on these channel would be primary.

Creating this split operation in the 450 - 460 MHz. Public Safety band would provide more talk channels in metropolitan areas, while still providing an allotment for existing offset operations. Existing offset operations could be given up to two years to change into band segment 1 or 2 depending on the type of communications conducted over the system. The low and high power two-way frequencies created under this plan will be of significant benefit to the numerous Public Safety agencies that are in need of channels to conduct two-way communications in a dispatch environment.

IMPLEMENTATION TIME TABLE

The Commission was bold and correct to propose rapid conversion to the first stage of narrow bandwidth in order to make additional channels available. This conversion by 1996 is basically beneficial to the major metropolitan areas. APCO's objection to this rapid implementation is a

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[REDACTED]